

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

NOTICE OF MOTION, RESPONSE DEADLINE, AND HEARING DATE

JPMorgan Chase Bank, N.A. has filed a Motion for Relief from the Automatic Stay and Codebtor Stay.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney you may wish to consult an attorney.)

1. If you do not want the Court to grant the relief sought in the motion or if you want the Court to consider your views on the motion, then on or before February 14, 2025, you or your attorney must do **ALL** of the following:

A. File an answer explaining your position at:

Clerk, U.S. Bankruptcy Court
U.S. Bankruptcy Court
900 Market Street, Suite 400
Philadelphia, PA, 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above, and

B. Mail a copy to the Creditor's attorney and the below listed:

Office of U.S. Trustee, Party of Interest
(Registered address)@usdoj.gov (notified by ecf)

Kenneth E. West
Office of the Chapter 13 Standing Trustee
190 N. Independence Mall West
Suite 701
Philadelphia, PA 19106
ecfemails@ph13trustee.com

MDK Legal
P.O. Box 165028
Columbus, OH 43216-5028

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above, and attend the hearing, the Court may enter an Order granting the relief requested in the Motion.
3. A hearing on the Motion is scheduled to be held before the Honorable Ashely M. Chan on February 18, 2025 at 11:00 a.m. in U.S. Bankruptcy Court, 900 Market Street, Suite 400, Courtroom #4, Philadelphia, PA, 19107.
4. If a copy of the Motion is not enclosed, a copy of the Motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
5. You may contact the Bankruptcy Clerk's office to find out whether the hearing has been canceled because no one filed an answer.

DATE: 01/30/2025

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:

Joseph Corte Cann, Jr

:
: Case No.: **24-13013**
: Chapter 13
: Judge Ashely M. Chan
Debtor(s) : * * * * *

JPMorgan Chase Bank, N.A.

:
: Date and Time of Hearing
: Place of Hearing
: February 18, 2025 at 11:00 a.m.
:

vs

Joseph Corte Cann, Jr

Eric Wright

Kenneth E. West

:
: U.S. Bankruptcy Court
: 900 Market Street, Suite 400, Courtroom
: #4
Respondents. : Philadelphia, PA, 19107

CERTIFICATE OF SERVICE

I certify that on the date of filing, a copy of the foregoing Motion for Relief from the Automatic Stay and Codebtor Stay was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

KENNETH E. WEST, Office of the Chapter 13 Standing Trustee,
ecfemails@ph13trustee.com

MICHAEL A. CIBIK, Attorney for Joseph Corte Cann, Jr, help@cibiklaw.com

I certify that on the date of filing, a copy of the foregoing document was sent by U.S.

Mail to the following:

Joseph Corte Cann, Jr, 1453 N 56th St, Philadelphia, PA 19131-3905

Eric Wright, 4237 W Warminster Ave, Philadelphia, PA 19104

/s/Stephen R. Franks